

**MMP&S****MILBER MAKRIS PLOUSADIS & SEIDEN, LLP**

ATTORNEYS AT LAW

100 MANHATTANVILLE ROAD

SUITE 4E20

PURCHASE, NY 10577

TELEPHONE: 914. 681.8700

FAX: 914.681.8709

HTTP://WWW.MILBERMAKRIS.COM

March 19, 2025

**Via CM/ECF Only**

Hon. Nusrat J. Choudhury, U.S.D.J.  
Eastern District of New York  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722

Re: *Deo, et al. v. Baron, et al.*  
Case No. 2:24-cv-06903 (NJC) (JMW)  
Response to March 8, 2025 Text Order

Dear Judge Choudhury:

This firm represents defendant Richards, Witt & Charles, LLP (“RWC”) in connection with the above-referenced action, and submits the within correspondence relative to Your Honor’s Text Order of March 8, 2025, and the preceding correspondence from the parties that led to that Text Order.

While Defendant Superb Motors Inc.’s (“Superb’s”) letter motion of March 5, 2025 [Doc. 71] speaks to a request for an extension of time to respond to Defendants Ally Financial Inc., NextGear Capital, Inc., and Nissan Motor Acceptance Company LLC’s (collectively, the “Financing Defendants”) letter motion [Doc. 69] on behalf of the “remaining Defendants” – RWC was not contacted nor consulted by Superb and/or any of the other “remaining Defendants” in connection with that letter motion and request. [Doc. 71]. RWC presumes this was an inadvertent oversight by Superb.

In sum, RWC is not a part of the group of defendants (i.e., the “Non-Financing Defendants” as referenced in Your Honor’s Text Order of March 8, 2025) that sought an extension of time to respond to the Financing Defendants’ letter motion, and RWC takes no position with respect to same.

Respectfully submitted,



Conor V. McDonald

cc: All Appearing Counsel (via CM/ECF)